

Exhibit "B"
Case Closure Summary
Marina Gateway Redevelopment Project
Site Designation Program

Case Closure Summary

Non-LOP or Voluntary Assistance Program

I. AGENCY INFORMATION

DATE: May 29, 2007

Agency Name: County of San Diego Dept. Environmental Health	Address: P.O. Box 129261
City/State/ZIP: San Diego, CA 92112-9261	Phone: (619) 338-2222 FAX: (619) 338-2377
DEH Staff Person: NASSER SIONIT	Title: Environmental Health Specialist III

II. CASE INFORMATION

Case No. H23772-002	RWQCB Case No. N/A
Site Name: MARINA GATEWAY HOTEL PROJECT (Former C & M Meat Packing Co.)	Site Address: 2501 & 2510 Cleveland Ave., National City CA 91950-6425
Property Owner: City of National City, 1243 National City Blvd., National City, CA 91950	
Responsible/Requesting Parties: Ms. Patricia Beard, Community Development Commission, City of National City 1243 National City Blvd., National City, CA 91950 Tel: 619-336-4255	
Type of Case: NON-TANK CASE	
Agency Notification of DEH Oversight: DTSC: 4/13/2001 RWQCB: 4/13/2001	

III. SITE CHARACTERIZATION AND/OR INFORMATION

Purpose of Investigation: Develop property to build hotel & commercial buildings	Substances Investigated: Gasoline, Diesel, Waste Oil, Metals, & Chlorinated Hydrocarbons
Site Characterization complete? YES 3-1-2007	
Monitoring Wells Installed? YES	Total Number: 17
Proper Screened Interval? YES	Number of decommissioned wells: 9
Range of groundwater levels on the site? 25.1 to 31.6 feet below surface (measured)	Groundwater Flow Direction: Northwest (Measured)
Most Sensitive Current Use: Existing Beneficial Groundwater Use: MUN, AGR, IND Existing Beneficial Surface Water Use: IND, REC2 and Potential: REC1	
Are Drinking Water Wells Affected? NO	RWQCB Basin Number: 909.12-La Nacion Hydrologic Sub Area
Is Surface Water Affected? YES	Nearest Surface Water name: PARADISE CREEK & PARADISE MARSH

Off-Site Beneficial Use Impacts (addresses/locations): N/A

Non-LOP - Underground Storage Tank Oversight handled outside the LOP
Non-Tank - Voluntary Assistance Program

H23772-002

TREATMENT AND DISPOSAL OF AFFECTED MATERIALS:

<u>Material</u>	<u>Amount</u>	<u>Action</u>	<u>DATE</u>
SOIL	270 CUBIC YARD	TREAT OFF-SITE	7/1/2003
SOIL	1000 CUBIC YARD	TREAT OFF-SITE	12/8/2004
SOIL	3321 CUBIC YARD	FILL SOIL	12/8/2004
SOIL	500 CUBIC YARD	TREAT OFF-SITE	1/25/2005
SOIL	67 CUBIC YARD	RECYCLED	5/21/2007

Case Closure Summary **Non-LOP or Voluntary Assistance Program**

III. SITE CHARACTERIZATION AND/OR INFORMATION (Continued)

H23772-002

MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS

	MAXIMUM	REMAINING
<u>SOIL</u>		
FLUORENE	= 1.1 mg/kg	= 1.1 mg/kg
Gasoline	= 194 mg/kg	= 194 mg/kg
Diesel	= 45000 mg/kg	= 45000 mg/kg
Benzene	= 3.7 mg/kg	= 3.7 mg/kg
Toluene	= 100 mg/kg	= 100 mg/kg
Ethyl benzene	= 89 mg/kg	= 89 mg/kg
Xylene (individual isomers or total)	= 470 mg/kg	= 470 mg/kg
1,2-Dichloroethane (1,2-DCA)	= 0.013 mg/kg	= 0.013 mg/kg
Antimony	= 626 mg/kg	= 626 mg/kg
Arsenic	= 23.3 mg/kg	= 19.3 mg/kg
Benzo(a)pyrene	= 0.29 mg/kg	= 0.29 mg/kg
Cadmium	= 238 mg/kg	= 238 mg/kg
Chromium	= 2690 mg/kg	= 2690 mg/kg
cis-1,2-Dichloroethene	= 0.005 mg/kg	= 0.005 mg/kg
Copper	= 14060 mg/kg	= 14060 mg/kg
Lead	= 37000 mg/kg	= 37000 mg/kg
Naphthalene	= 36 mg/kg	= 36 mg/kg
Polychlorinated Biphenyls (PCBs)	= 2.7 mg/kg	= 2.7 mg/kg
Pyrene	= 1.6 mg/kg	= 1.6 mg/kg
Tetrachloroethene (PCE)	= 0.026 mg/kg	= 0.026 mg/kg
Trichloroethene (TCE)	= 0.016 mg/kg	= 0.016 mg/kg
Zinc	= 95400 mg/kg	= 95400 mg/kg
<u>GROUNDWATER</u>		
Gasoline	= 269000 ug/l	< 50 ug/l
Benzene	= 12500 ug/l	= 3 ug/l
Toluene	= 32700 ug/l	= 4.9 ug/l
Ethyl benzene	= 6600 ug/l	= 16 ug/l
Xylene (individual isomers or total)	= 21000 ug/l	= 34 ug/l
1,2-Dichloroethane (1,2-DCA)	= 210 ug/l	= 4.9 ug/l
Arsenic	= 44 ug/l	= 22.2 ug/l
Cadmium	= 137 ug/l	= 0.178 ug/l
Chromium	= 14200 ug/l	= 1.93 ug/l
Copper	= 84800 ug/l	= 4.32 ug/l
Lead	= 57600 ug/l	= 6.63 ug/l
Trichloroethene (TCE)	= 18 ug/l	< 1 ug/l
Zinc	= 169000 ug/l	= 13.8 ug/l
Napthalene	= 959 ug/l	= 5.8 ug/l
<u>SURFACE WATER</u>		
Lead	= 22 ug/l	= 22 ug/l
Zinc	= 70.7 ug/l	= 70.7 ug/l
Copper	= 17.8 ug/l	= 17.8 ug/l

Case Closure Summary

Non-LOP or Voluntary Assistance Program

Comments:

The Community Development Commission (CDC) of City of National City approved in 1997 the development of a hotel and commercial project at the former Cleveland Property and the former Cuyamaca Property. The CDC applied to the CAL-EPA's Site Designation Committee in 2000. On December 7, 2000 the County of San Diego, Department of Environmental Health (DEH) was designated as the lead agency to oversee the environmental activities at the site in conjunction with other interested local and State regulatory agencies.

The assessment of the site revealed that historical releases of petroleum hydrocarbons, metals, volatile organic compounds, polynuclear hydrocarbons and polychlorinated biphenyls have impacted the soil, soil gas, groundwater, and surface water at the site.

The mitigation of the site was achieved by excavation and off-site disposal of 1,837 cubic yards of impacted soil and by on-site reconsolidation and capping of 33,211 cubic yards of impacted soil in several areas. The consultant, SCS Engineering, reported that out of 33,211 cubic yards of residual contaminated soil, a total of 4,105 cubic yards are located in several scattered places throughout the site, a total of 27,500 cubic yards are located in an area called the area of contamination (AOC 1), and a total of 1,606 cubic yards remain in place at the proposed hotel and restaurant building locations. All of the contaminated soil left in several locations on-site and reconsolidated into Areas of Contamination was according to an approved work plan through the California Integrated Waste Management Board.

A limited human health risk assessment was conducted by using the highest soil gas concentrations of benzene, toluene and trichlorofluoromethane measured in the perimeter of the area of proposed hotel buildings. SCS Engineering concluded that the residual concentrations of these volatiles have a low likelihood of resulting in a significant health risk to future occupants of the proposed hotel, restaurant and commercial buildings.

The following requirements were established to follow upon completion of assessment and mitigation actions:

1. Continuation of groundwater monitoring and submittal of a quarterly report to DEH.
2. Preparation and submittal to DEH of a post-closure addendum report to include the end-disposition of the contaminated soil during grading and excavation activities on-site.
3. Implementation of the post-closure monitoring and maintenance plan to include inspection and maintenance of the reconsolidated and capped areas including the area of AOC 1.
4. Recording a deed covenant with the County of San Diego that provides environmental restrictions on the future property use and requires the disclosure of site conditions and continuation of the planned monitoring to the future owners/operators of the site.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? YES

Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? YES

Does corrective action protect public health for current land use? YES

Case review was based on proposed use as Hotel and Commercial

Are there other issues DEH needs to follow up on? YES:

Post Closure Monitoring & Maintenance

Site Management Requirements:

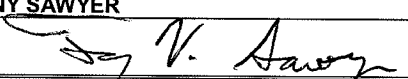
Any contaminated soil excavated as part of subsurface construction work must be managed in accordance with the legal requirements at that time.

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Should corrective action be reviewed if land use changes? YES
List Enforcement Actions Taken: NONE
List Enforcement Actions Rescinded: NONE
Is this account up to date and current? Yes

V. LOCAL AGENCY REPRESENTATIVE DATA

H23772-002

Name: TONY SAWYER	Title: HYDROGEOLOGIST
Signature: 	Date: 5-29-07

VI. RWQCB NOTIFICATION

Date Submitted to RWQCB:	RWQCB Response:	
RWQCB Staff Name:	Title:	Date:

VII. ADDITIONAL COMMENTS, DATA, ETC.

All monitoring wells must be maintained to continue monitoring of groundwater through the completion of post-monitoring actions.
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This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.

Case Closure Summary

Leaking Underground Fuel Storage Tank Program

I. AGENCY INFORMATION

DATE: 5/24/2007

Agency Name: County of San Diego, Environmental Health, SAM	Address: P.O. Box 129261
City/State/ZIP: San Diego, CA 92112-9261	Phone: (619) 338-2222 FAX: (619) 338-2377
Responsible Staff Person: Nasser Sionit	Title: Environmental Health Specialist III

II. CASE INFORMATION

Site Facility Name: Marina Gateway Hotel (Former Cleveland Associates West) APN 559-160-03				
Site Facility Address: 2501 Cleveland Avenue, National City, CA 91950-6425				
RB LUST Case No: N/A		Local Case No: H23772-003		LOP Case No: N/A
URF Filing Date: 5/15/2003		SWEEPS No: N/A		
Responsible Parties: Ms. Patricia Beard Community Development Commission City of National City		Address: 1243 National City Blvd. National City, CA 91950		Phone Number: (619) 336-4255
Tank No.	Size in Gal.	Contents	Closed in Place/Removed	Date
1	1000	Fuel Oil	Removed	4/4/2003

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Fuel Oil from UST system			
Site Characterization complete? Yes		Date Approved By Oversight Agency: 3/1/2007	
Monitoring Wells Installed? No		Number: 0	Proper Screened Interval? N/A
Highest GW Depth Below Ground Surface: 25.1 (Measured nearby site)		Lowest Depth: 31.6 (Measured nearby site)	Flow Direction: Northwest (Measured nearby site)
Most Sensitive Current Use: Existing Beneficial Groundwater Use: MUN, AGR, IND Existing Beneficial Surface Water Use: IND, REC2 and Potential: REC1			
Are Drinking Water Wells Affected? No		Aquifer Name: 909.12 La Nacion Hydrologic Sub Area	
Is Surface Water Affected? No		Nearest SW name: Paradise Creek and Paradise Marsh	
Off-Site Beneficial Use Impacts (addresses/locations): N/A			
Report(s) on file? Yes		Where is Report(s) Filed? County of San Diego, Environmental Health	
TREATMENT AND DISPOSAL OF AFFECTED MATERIAL			
Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Tank(s)	1000 Gallon Tank	Cleaned Onsite and Hauled to Pacific Steel	4/4/2003
Piping	None Found	N/A	N/A
Soil	72 Cubic Yards	TPS Technologies, Adelanto, CA	9/9/2003
Tank Rinsate	800 Gallons	Hauled to DeMenno Kerdoon Compton, CA	4/3/2003

Case Closure Summary

Leaking Underground Fuel Storage Tank Program

III. RELEASE AND SITE CHARACTERIZATION INFORMATION (Continued)

H23772-003

MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS - - BEFORE AND AFTER CLEANUP

Contaminant	Soil (ppm)		Water (ppm)		Contaminant	Soil (ppm)		Water (ppm)	
	Before	After	Before	After		Before	After	Before	After
TPH (Gas)	17	<10	<.5	N/A	MTBE	<.005	<.005	<.001	N/A
TPH (Diesel)	8060	500	<.5	N/A	TBA	<.025	<.025	<.005	N/A
TPH(Oil)	2540	550	<.5	N/A	TAME	<.005	<.005	<.001	N/A
Toluene	.082	<.005	<.0005	N/A	ETBE	<.005	<.005	<.001	N/A
Xylene	.938	<.015	<.0005	N/A	DIPE	<.005	<.005	<.001	N/A
Benzene	<.01	<.005	<.0005	N/A	Lead	55	N/A	N/A	N/A
Ethylbenzene	.057	<.005	<.0005	N/A					

Comments:

A 1000 gallon underground fuel oil tank was discovered in 2003 during building demolition for site redevelopment.

The tank was removed on 4/4/2003 and a post tank removal excavation work plan was implemented. Approximately 72 cubic yards of soil were removed and transported to TPS Technologies.

Additional investigation was conducted adjacent to the tank pit by collecting soil samples from two strataprobe borings and sampling groundwater from each borehole with a hydropunch water sampling device. General groundwater depth and flow direction were determined from wells that were installed for case H23772-002 and were not in the immediate area of the tank. The water samples collected next to the tank pit had no detectable levels of petroleum hydrocarbons or volatile organic compounds and the release was determined to be limited to soil only.

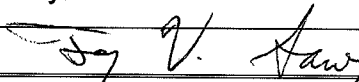
The consultant estimates that approximately 98 cubic yards of fuel-oil-impacted soil remains at depths up to 17 feet below grade with TPH concentrations up to 500 mg/kg. The impacted soil remains in an area that will be used for Hotel parking.

Based on their work the consultant concludes that the residual contamination is limited and poses no significant risk to the environment or public health. The DEH concurs with these conclusions.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan?		Yes
Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan?		Yes
Does corrective action protect public health for current land use?		Yes
Case oversight completed based upon the future site use as a hotel and commercial		
Site Management Requirements:		
Any contaminated soil excavated as part of subsurface construction work must be managed in accordance with the legal requirements at that time.		
Should corrective action be reviewed if land use changes?		Yes
Monitoring Wells Decommissioned:	No	Number Decommissioned: 0 Number Retained: 0
List Enforcement Actions Taken: Notice of Corrective Action and Reimbursement Responsibility		
List Enforcement Actions Rescinded: None		

V. LOCAL AGENCY REPRESENTATIVE DATA**H23772-003**

Name: Tony Sawyer	Title: Hydrogeologist Land and Water Quality Division
Signature: 	Date: 5-29-07

VI. RWQCB NOTIFICATION

Date Submitted to RB: N/A Soils Only	RB Response: N/A	
RWQCB Staff Name: N/A	Title: N/A	Date: N/A

VII. ADDITIONAL COMMENTS, DATA, ETC.

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.